

IN THE UNITED STATES DISTRICT COURT  
For The Middle District of ALABAMA Northern Division

RECEIVED

Mark Shannon Wheeler

AIS # 139044

CASE # 2:06-CV-274-MHT

V.

Bill Segrest et al  
Defendant

DEBRA P. IV  
U.S. DIST. CT.  
MIDDLE DIST.

Motion for Plaintiff To Request this Courts Permission  
to Motion for Summary Judgment, and Motion  
for Summary Judgment

In Compliance with Rule 56 (a) Fed. R. Civ. Proc.

Comes now the Plaintiff Mark Shannon Wheeler, and  
Prays this Honorable United States District Court for  
the Middle District of ALABAMA Northern Division,  
TO GRANT these Motions: Motion for Plaintiff to Re-  
quest this Courts Permission to Motion for Summary  
Judgment, and Motion for Summary Judgment,

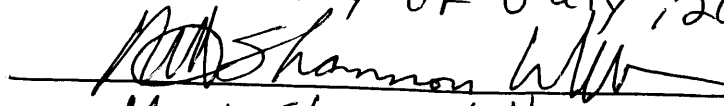
Grounds are as follows, in which sought relief can  
be GRANTED.

- 1). VOCAL Members and those with No Protest "Re-dress rights should be barred.
- 2). Defendant Bill Segrest, et al was Ordered to ANSWER  
Plaintiff Wheeler's Claims in Complaint, amended Complaint,  
at last order of this Courts deadline was July 5th  
2006. "The Plaintiff has not received an Answer"  
this the 10th day of July 2006, and is entitled relief.  
Plaintiff Wheeler and thousands (perhaps) of Alabama  
Prisoners with class A violent felony convictions are  
due "rehearings" to show this Honorable Court that  
the ex post facto rights either have not been Violated,  
or will not be violated, of the prior 10 year or one  
third of Sentence "Guideline Setting" that Alabama Pris-  
oners Sentenced before Dec. 4th-2001 were entitled to,  
with class A violent felony convictions. Plaintiff Wheeler  
is due 22 months "at least" reimbursement, and is due a  
re-hearing to show this Court that whether or not the  
ex post facto still exist, (15 years or 85%). Plaintiff Wheeler  
Prays this Honorable Court for Summary Judgment. This  
The 10th day of July, 2006.

Mark Shannon Wheeler 139044  
Plaintiff Pro Se

## Certificate of Service

I MARK Shannon Wheeler hereby Certify that I have mailed a copy of the same to the Defendant Bill Segrest et al by Inmates Free Legal MAIL, 1st Class Postage Pre Paid thereby, U.S. mail, and addressed to Defendants Counsel at: STATE OF ALABAMA OFFICE OF BOARD OF Pardons and Paroles, To: Steven M. Sirmon, Assistant Attorney General, 301 South Ripley Street, P.O. BOX 302405, Montgomery, AL. 36130, This done, the 10th day of July, 2006.

  
Mark Shannon Wheeler  
Plaintiff

AIS # 139044

Mark Shannon Wheeler  
AIS # 139044-K-125  
Kilby Corr. fac.  
P.O. Box 150  
MT. Meigs, AL.  
36057